

## **EXHIBIT C**

1                   UNITED STATES DISTRICT COURT  
2                   DISTRICT OF MASSACHUSETTS3    In re: NEURONTIN MARKETING, SALES MDL DOCKET NO: 1629  
4                   PRACTICES, AND PRODUCTS  
4                   LIABILITY LITIGATION           Master File No. 04-10981

5                   /

6    THIS DOCUMENT RELATES TO:

7                   ALL PRODUCTS LIABILITY  
8                   ACTIONS                   /9  
10                  VIDEOTAPED  
10                  DEPOSITION OF:            CHERYL D. BLUME, Ph.D.  
11                  DATE:                    November 12, 2007  
12                  TIME:                    9:25 a.m. to 6:07 p.m.  
13                  PLACE:                   13902 North Dale Mabry Highway  
14   Suite 122  
14   Tampa, Florida15                  PURSUANT TO:            Notice by counsel for  
16   Defendants for purposes  
17   of discovery, use at  
17   trial or such other  
18   purposes as are permitted  
18   under the Federal Rules  
18   of Civil Procedure19                  BEFORE:                   VALERIE A. HANCE, RPR  
20   Notary Public, State of  
20   Florida at Large21   Volume 1  
22   Pages 1 to 370

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THE VIDEOGRAPHER: This is the videotaped deposition of Cheryl Blume, Ph.D., being held in the offices of Pharmaceutical Development Group located at 13902 North Dale Mabry Highway in Tampa, Florida, on November 12th, 2007. The time is 9:25 a.m.  
 My name is David Leggett. I'm the videotape specialist. And the court reporter is Valerie Hance. Will counsel introduce themselves.  
 MR. BARNES: Richard Barnes on behalf of Pfizer.  
 MR. GUNTER: Vince Gunter on behalf of Pfizer, defendants.  
 MR. WASICKO: Michael Wasicko on behalf of Pfizer.  
 MR. FROMSON: Kenneth Fromson on behalf of the product liability plaintiffs in the MDL, liaison counsel in the New York coordinated litigation, and counsel for plaintiffs in the action of Nicolette Crone vs. Pfizer, Lake County, California.  
 MR. ALTMAN: Keith Altman, nonattorney with Finkelstein & Partners.  
 MR. BARNES: Counsel on the phone, please identify themselves.  
 MS. DALEY: Annamarie Daley, counsel for

1 A. "1-800-LAW-FIRM."  
 2 Q. And would you describe the picture for the  
 3 record, please, that is between the word "Suicide" and  
 4 "1-800-LAW-FIRM."  
 5 A. I think it's a close-up of the picture that  
 6 was in the earlier one.  
 7 Q. And what -- what -- can you describe it for  
 8 the record, please.  
 9 A. It appears to be a lady's silhouette with her  
 10 hand on a loop of some sort.  
 11 Q. Is it -- and is it a loop or does it look like  
 12 a noose?  
 13 A. Well, I don't know. I don't know. I guess it  
 14 could be either. I don't know. I don't think I've ever  
 15 seen a real noose.  
 16 Q. Okay. Can you publish that to the jury,  
 17 please.  
 18 MR. FROMSON: Just note my objection to the  
 19 document. Lack of foundation.  
 20 BY MR. BARNES:  
 21 Q. Can you hold it up, please.  
 22 Do you understand this to be attorney  
 23 advertising that was referred to in your report at  
 24 page -- at paragraph 215?  
 25 A. I just --

1 MR. FROMSON: Just note my objection to form.  
 2 Do you mean does she refer to this as this is  
 3 the advertising that's referenced or is it  
 4 advertising in general?  
 5 BY MR. BARNES:  
 6 Q. Is this attorney advertising for Neurontin  
 7 lawsuits and suicide?  
 8 A. This --  
 9 MR. FROMSON: Objection as to the form of the  
 10 question. Lack of foundation.  
 11 THE WITNESS: I refer here to a series of  
 12 documents that I think one of your in-house  
 13 counsel, last name Su, it's her records that I'm  
 14 referring to. And she discusses in one of these  
 15 that there has been an attorney placement --  
 16 placement by an attorney's firm for suicide. And  
 17 I'm pretty confident that that's to what I'm  
 18 referring.  
 19 BY MR. BARNES:  
 20 Q. So did you -- when did you -- when did you --  
 21 well, how did you -- so you know there was a document  
 22 that talks about attorney advertising in 2003 that  
 23 you've reviewed and put into your report, correct?  
 24 A. I reviewed this from your database, yes.  
 25 Q. Now, did you ask -- did you ask for more

1 information concerning the nature and extent of the  
 2 attorney advertising in 2003 when forming your opinions  
 3 in this case?  
 4 A. I knew that there was attorney information in  
 5 2003.  
 6 Q. Advertising?  
 7 A. Advertising for cases, yes.  
 8 Q. And do you know if it ran nationwide? Did you  
 9 make any inquiry as to the extent of the advertising in  
 10 2003?  
 11 A. No.  
 12 Q. Did you make any inquiry as to the extent of  
 13 the attorney advertisement for Neurontin cases in 2004?  
 14 A. I don't even know if it was still going on. I  
 15 don't know.  
 16 Q. Did you make any inquiry as to the extent of  
 17 the plaintiff's attorney advertising for Neurontin cases  
 18 in 2005?  
 19 A. No.  
 20 Q. Did you make any inquiry as to the extent of  
 21 attorney advertising for Neurontin cases in 2006?  
 22 A. No.  
 23 Q. Did you make any inquiry as to the extent of  
 24 attorney advertising for Neurontin cases in 2007?  
 25 A. No.

1 Q. Do you think that -- that attorney advertising  
 2 for Neurontin cases, as it pertains to suicide between  
 3 2003 and 2006, could artificially stimulate reports of  
 4 adverse events pertaining to Neurontin?  
 5 MR. FROMSON: Just note my objection as to the  
 6 form of the question.  
 7 THE WITNESS: Well, there is suicide events  
 8 with Neurontin from the beginning of time with  
 9 Neurontin. I mean, they were in the clinical  
 10 trials. But it's conceivable that the events, if  
 11 these indeed are true and were published, could  
 12 have stimulated reports. I mean, the events with  
 13 Dr. Franklin could have stimulated reports. I  
 14 don't know.  
 15 MR. BARNES: Move to strike. Would you read  
 16 back my last question. I want her -- I would like  
 17 for her to answer my question, please.  
 18 (The reporter read the portion requested.)  
 19 BY MR. BARNES:  
 20 Q. Please answer that question.  
 21 MR. FROMSON: Note my objection to the form of  
 22 the question. And I'll also object that it's been  
 23 asked and answered.  
 24 You can answer.  
 25 THE WITNESS: It is possible that advertising

1 may have impacted the number of reports.  
 2 BY MR. BARNES:  
 3 Q. Did you undertake any analysis to measure the  
 4 effect of attorney advertising on stimulating reports  
 5 after -- after January 1, 2003 --  
 6 MR. FROMSON: Objection.  
 7 BY MR. BARNES:  
 8 Q. -- for Neurontin and suicide?  
 9 MR. FROMSON: Objection as to the form.  
 10 THE WITNESS: I didn't make an effort to  
 11 evaluate the impact of either events, either the  
 12 guilty plea or the suicide events. But I broke one  
 13 of the databases at 2002, so that would come before  
 14 any of these issues.  
 15 MR. BARNES: Move to strike. Would you please  
 16 read back the last question. And I'd like an  
 17 answer to that question, please.  
 18 (The reporter read the portion requested.)  
 19 MR. FROMSON: Note my objection to the  
 20 question as being asked and answered.  
 21 THE WITNESS: Well, I feel that I've answered  
 22 it fully, but I will repeat the answer.  
 23 I did not make an attempt to look at any  
 24 impact, if there was an impact, if any, on  
 25 advertising, from 2003 on.

1 BY MR. BARNES:  
 2 Q. On -- on reporting of adverse events to FDA,  
 3 correct?  
 4 A. I did not make an effort to look at if there  
 5 was an impact.  
 6 Q. When you were retained in 2003, did you advise  
 7 Mr. Finkelstein's firm that attorney advertising could  
 8 have an adverse effect on the FDA database as it  
 9 pertains to reports of suicidal behavior?  
 10 MR. FROMSON: Just note my objection as to the  
 11 form of the question.  
 12 THE WITNESS: May I answer?  
 13 MR. FROMSON: Yeah, absolutely.  
 14 THE WITNESS: What I said with the attorneys?  
 15 MR. FROMSON: Yes.  
 16 THE WITNESS: I think it was discussed in one  
 17 conversation and we took that into consideration.  
 18 I took that into consideration, as I recall, when  
 19 we did -- we did somewhat of a data cut, an  
 20 arbitrary data cut at -- in 2002. And we did  
 21 another one at -- yeah, we did an -- it was  
 22 somewhat in 2002 to coincide with postherpetic, but  
 23 that was before the public announcement, both sets  
 24 of public announcements.  
 25 BY MR. BARNES:

1 Q. Where is that -- where is that documented in  
 2 your report?  
 3 A. I did a cut at 2002?  
 4 Q. Yes.  
 5 A. Well, it's --  
 6 MR. FROMSON: Just note my objection as to the  
 7 form to the extent she's already answered.  
 8 THE WITNESS: I think the title of it is 2002  
 9 to 2000 -- 2002 to 2006.  
 10 BY MR. BARNES:  
 11 Q. What analysis -- what analysis are you  
 12 referring to in that last answer, in your report? I'd  
 13 like to see it.  
 14 A. Well, I did a whole section of the report from  
 15 2002 on and prior up until 2002 and then following 2002.  
 16 Q. So you did a -- so you did a cut in 2002 that  
 17 stopped in 2002?  
 18 A. Okay. Let me show you.  
 19 '94 to '96, '96 to 2002, 2003 to present. And  
 20 the 2002 would have been before both the guilty plea and  
 21 these advertisements, if what you're telling me is true,  
 22 in these brands in 2003.  
 23 Q. So is the reason why you -- you did the cut  
 24 that stopped in 2002 was the -- is the potential effect  
 25 of notoriety bias on events reported after --